

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

(DRAFT)

Conditional Major / Synthetic Minor, Construction / Operating

Permit: F-08-003

International Paper Company

Lexington, KY 40509

January 3, 2008

Mark Labhart, Reviewer

SOURCE ID: 21-067-00085

AGENCY INTEREST: 1059

ACTIVITY: APE20070001

**SOURCE DESCRIPTION:**

International Paper is a manufacturer of corrugated fiberboard boxes. Equipment at the source consists of the corrugated fiberboard machine, rotary die cutters to cut the outline of the boxes, and Flexo Folder Gluers, which apply ink and/or adhesive using flexographic technology.

The adhesive is a cornstarch based product containing low VOC content. The ink used is also a low VOC product. There is a small amount of particulate from the rotary die cutters and the corrugator. Particulate emissions are controlled by a cyclone which is used to separate scrap material from the air stream used to convey trim to the scrap baler.

The corrugator is the limiting factor in production for the source.

**COMMENTS:**

- Maximum capacity for the Corrugator is 3810.6E 6 sqft/yr. Maximum capacity for the box lines is 27,588E 6 sqft/yr. Therefore emissions will be limited by the corrugator.
- Emissions of scrape paper dust are based on the cyclone efficiency. The cyclone itself is not control equipment, rather it is part of the processing equipment for the scrape material. The consultant provided a report in the source application on collection efficiency of cyclones at a container plant which indicates 99.9% collection efficiencies are realistic for this type of material. Potential emissions were then calculated using this percentage, 0.01% as the overall emission factor.
- 40 CFR Part 60, Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units; is not applicable to either of the boilers located at this source. Each boiler was commenced prior to June 9, 1989, and the capacity of boiler #2 is below 10MMBtu/hr.
- 401 KAR 59:212. New graphics arts facilities using rotogravure and flexography, is not applicable to the source due to the Federally enforceable limitations on the PTE.

- 401 KAR 59:050. New storage vessels for petroleum liquids, is not applicable to the 10,000 gallon fuel oil storage tank. The definition of petroleum liquid in 59:050, Section 2 excludes number 2 fuel oil.

**EMISSION AND OPERATING CAPS DESCRIPTION:**

International Paper voluntarily requested limits of 90 tpy or less for VOC emissions, 9 tpy or less for individual HAP emissions, and 22.5 tpy or less for all combined HAPs.

**OPERATIONAL FLEXIBILITY:**

The source is not restricted as to hours of operation or quantity of product produced while remaining within the caps above.

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.